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**FILED**  
DISTRICT COURT OF GUAM

NOV 21 2008

JEANNE G. QUINATA  
Chief of Court



Attorneys for Defendant

IN THE DISTRICT COURT OF GUAM

DEBBIE ANN REYES PEREZ,	)	CIVIL CASE NO. CV08-00007
	)	
Plaintiff,	)	
	)	STIPULATED HIPAA
vs.	)	PROTECTIVE ORDER
	)	
SUPERIOR COURT OF GUAM,	)	
	)	
Defendant.	)	
	)	

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The above captioned parties, through counsel stipulate to the following protective order. The parties are hereby granted the right, upon compliance with the applicable discovery provisions of the Federal Rules of Civil Procedure and the orders of this Court, to obtain from any health care provider, health plan, or other entity covered by the Health Insurance Portability and Accountability Act of 1996, Pub. L. No. 104-191, 110 Stat. 1936 (1996) ("HIPAA"), any and all information relating to the past, present, or future medical, mental or emotional condition of Debbie Ann Reyes Perez (DOB [REDACTED]/1966, SS No. XXXX-XX-8365), as well as any and all information relating to the provision of health care to such individual, including without limitation psychotherapy and counseling, and payment for the provision of such health care from 1995 to the present.

This order authorizes any third-party who is provided with a subpoena requesting the production of documents or commanding attendance at deposition or trial to disclose the Protected Health Information in response to such request or subpoena. This order is intended to authorize

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such disclosures under the privacy regulations issued pursuant to HIPAA. See, 45 C.F.R. § 164.512(e)(1)(i).

The parties are expressly prohibited from using or disclosing the protected health information obtained pursuant to this order for any purpose other than this action. Further, immediately upon conclusion of this action, the parties are ordered to either return to the covered entity that provided the protected health information all materials received by them (including all copies made) from the covered entity, or else destroy such materials (including all copies made). See, 45 C.F.R. §§ 164.502(b) and 164.512(e)(1)(v).

SO STIPULATED:

TEKER TORRES & TEKER, P.C.

By:   
PHILLIP TORRES, ESQ.

DOOLEY ROBERTS & FOWLER LLP

By:   
TIM ROBERTS, ESQ.

  
APPROVED AND SO ORDERED is

Judge, District Court of Guam